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June 21, 2019

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Blockchain Technologies Corp. v. RVH, Inc., et al.
Civil Action No. 18-cv-9352 (AJN)

Dear Judge Nathan:

Pursuant to the Court Order dated June 17, 2019, the Parties hereby submit the instant joint letter. Counsel have communicated several times regarding the above-captioned matter, both with regard to the complicated nature of discovery involved and with regard to determining whether resolution were possible at this stage of the proceedings.

With regard to discovery, the Parties have exchanged discovery and are working together in fashioning an orderly process. Nonetheless, by virtue of the multiple sources of requested information and the extensive paperwork involved in the transactions underlying the claims and counterclaims in this matter, discovery is ongoing. In fact, Defendants' counsel advises that this week he has tried to narrow some of the factual issues in this matter and has served Plaintiff with an additional Notice to Admit. Plaintiff will be serving third-party discovery and supplemental discovery requests in the near future and will be producing to Defendants requested documents that literally have taken months to locate and gather. While the Parties are working collaboratively, we have not made the progress that either had expected or hoped.

Given the above, counsel jointly request that discovery be extended through September 2019. At that time, we believe it would be constructive for the Parties to appear before the Magistrate Judge for a settlement conference.

Regarding whether either Party intends to move for summary judgment, it is premature for a representation to be made.

If the Court grants this request to extend the period for discovery, Plaintiff will submit a proposed Order to the Court. Thank you for your attention to this request.

Respectfully submitted,

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